

| VISITOR ACCESS AND CIRCULATION | |
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| <i>Separate Year-Round Pathway in GTNP</i> | |
| COMMENT: | It is also my understanding that it is against current National Park Service Policy to allow mechanized vehicles off existing roadways. If a trail is cut away from the highway, ATVers are going to demand their rightful use of that road in the summer as well. |
| RESPONSE: | Once a final decision is made, any need to depart from the existing regulations would be identified. The separate pathway for GTNP is a case in point. The recommended rule change would specify the types of use allowable on the pathway. This is represented in the alternative as a snowmobile route in the winter and a bicycle/nonmotorized trail at other times. |
| <i>East Entrance/Washburn Pass</i> | |
| COMMENT: | For the level of use that is or can be expected on the groomed route over Sylvan Pass or the ungroomed route over Washburn Pass, neither grooming nor avalanche control is justified. |
| RESPONSE: | This comment goes to the decision to be made. It is up to the decision maker to select actions or changes in management and justify them in the record of decision. Neither grooming or avalanche control are proposed for Washburn Pass. |
| <i>Impacts of Plowing the Road</i> | |
| SUMMARY COMMENT: | Plowing the road from West Yellowstone is unjustified because it would have a number of effects: would simply transfer snowmobile pollution, noise, and congestion to other road segments while adding automobiles to the mix; would be too costly; would be impossible to keep open; it will promote rim riding and illegal access; inspire snowmobilers to cut new routes in previously unused areas; pollution from autos, diesel buses, etc. on the plowed section; more crowding by day users; |
| SUMMARY RESPONSE: | The impacts of plowing the road from West Yellowstone to Old Faithful (alternatives B and C) are disclosed to the degree necessary in the FEIS. Any comments referring to the justification for this action, or the lack of it, go to the decision to be made. References to this action, or to justification for this action, as the preferred alternative are no longer pertinent due to the expression of a new preferred alternative in the FEIS. |
| COMMENT: | One other thing that I did not see addressed is the amount of anticipated closure time that will result from plowing roads. What happens when winter storms hit the area? Is the road going to be closed or will plows work round the clock to keep the road open? |
| RESPONSE: | The intent of this alternative feature is to have the road open for wheeled vehicle access. The intensity of the plowing effort depends on funding, personnel and material available to do the job – as is true with any plowed road in any jurisdiction within the greater Yellowstone area. |
| COMMENT: | By adopting the preferred alternative of plowing the road the Park Service is ignoring the preferences and desires of the majority of visitors who utilize the Park in the winter. |

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| RESPONSE: | NPS points out that the majority of visitors who were surveyed in the parks were snowmobilers. It is reasonable to conclude with or without the survey that snowmobilers would prefer the status quo – to continue to access the park using snowmobiles. This is a consideration for the decision maker, who must also consider the desires and preferences of all others who are interested in this action. Many people expressed the preference for eliminating snowmobile use. However, the primary consideration for the decision maker is the degree to which snowmobiles, or other uses governed by this analysis, affect the resources and values associated with the parks. The decision is not subject to a vote. |
| COMMENT: | Will there be plentiful turnout areas provided? |
| RESPONSE: | Turnout areas will be provided as necessary for rest areas and scenic views. |
| COMMENT: | What damage would the cleated snowcoach tracks do to the already severely compromised roads of Yellowstone? |
| RESPONSE: | The fleet of snowcoaches with cleated tracks is not expected to grow any larger than at present. |
| COMMENT: | With the amount of snow this region receives, where in the Old Faithful area or many miles of the road is the plowed snow going to be stored? |
| RESPONSE: | This is a technical issue that can be solved during implementation. In capacity analysis parking capacity was reduced by at least 50% to accommodate snow storage. |
| <i>Affordable Access and Access for Disabled People</i> | |
| COMMENT: | There is a statement that plowing the road will provide a less expensive alternative to snowmobiles but the data from the winter use surveys does not support your conclusions that the majority of people need or want a less expensive alternative. |
| RESPONSE: | The winter use survey is not the sole source of information, nor is it reflective of management issues or resource concerns. Similarly, it does not sample a population that might wish to access the park if it were more affordable; it samples only the people who clearly can afford to be there at the present time. |
| COMMENT: | Regarding conclusions for visitor access & circulation, it is concluded that access under alternative A is costly. The same conclusion must be reached for each and every alternative. |
| RESPONSE: | Certainly it is costly under all alternatives. The intent in alternative B is to make it less costly in areas that the park service can exercise some control. |
| SUMMARY COMMENT: | My principal concern with ALL the alternatives as written is that they do not adequately address access by the disabled that may have an impact on the environment and would have an impact on visitor experience. |

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| SUMMARY RESPONSE: | Access for the elderly, or for mentally and physically disabled citizens is best afforded through any mass transit system, bus or snowcoach. Any one who can ride a snowmobile can ride a bus – therefore, it is not a matter of access but of preference. |
| SUMMARY COMMENT: | Americans should be provided affordable access to the splendor of Yellowstone during the winter months in a manner which best protects park resources. |
| SUMMARY RESPONSE: | Part of the intent for alternative B is to make access to the park’s interior more affordable. |
| SUMMARY COMMENT: | So where is the analysis of what it costs these companies in relation to what the Park Service is going to charge or needs to charge of a bus ride to Old Faithful and back. |
| SUMMARY RESPONSE: | A detailed analysis will not be done. For purposes of developing a plan it is sufficient to know that mass transit via snowcoach, as a currently available form of winter access, is feasible. Also, if bus and van mass transit access is a service that people use in the summer, it seems reasonable that they would use it during the winter. Costs of the service are bearable for a sufficient number of customers and obviously profitable enough for providers to continue the service. |
| Costs | |
| COMMENT: | The DEIS fails to answer what funds would be funneled to YNP to plow and maintain the road from West Yellowstone to Old Faithful. The cost of plowing can’t be economical; more expensive for taxpayers, and dollars should be spent instead on other problem areas such as a neglected and aging infrastructure. |
| RESPONSE: | Such a disclosure is not necessary in an EIS of this type to determine a plan. Administrative and maintenance costs by alternative are shown in Appendix F of the EIS. The cost of grooming and the cost of plowing on the average are not substantially different. Plowing will create frost heaves as big as a house. |
| SUMMARY COMMENT: | The NPS must disclose and discuss the impact of grooming and plowing on the road surface since this constitutes yet another impact of snowmobile recreation on the Parks, non-winter park visitors, public safety, and on park budgets. Need to anticipate the cost of plowing the road on the road surface – damage to pavement. |
| SUMMARY RESPONSE: | These costs are figured into the estimates of cost by alternative found in Appendix F. |
| SUMMARY COMMENT: | The plowing of roads would most likely cause more accidents due to the inability to keep the roads snow and ice-free. To keep them safe would require the useage (sic) of chemicals or a salt solution. |
| SUMMARY RESPONSE: | More accidents are possible, particularly in alternative C which would have less regulated traffic on the plowed section. Replacing the large volume of snowmobile/snowcoach traffic in alternative B with scheduled and limited mass transit wheeled vehicles (with trained and experienced drivers) appears to be relatively more safe. Salt and chemicals are not used on snowy roads in the park – sand is used. |

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| SUMMARY COMMENT: | The costs for this alternative [B] should either include the cost of the bus system if run by the Park Service or provide an analysis justifying the estimated fares for a private contractor. The alternative should also address whether or not a subsidy from the Park Service would be necessary to keep the fares at a reasonable level. |
| SUMMARY RESPONSE: | The mass transit bus system proposed under alternative B would be managed by the NPS but operated under permit by a concessionaire. Businesses bid on the opportunity to operate such a service, aside from developing a prospectus and managing the permit, there are no substantial costs to the government. Under this alternative there is no proposal to subsidize the transit system. |
| COMMENT: | The preferred alternative [B] is the second most expensive, and it does not consider increased costs of road maintenance, costs of the buses, the maintenance of the buses, the personnel for the buses, the personnel for the plowing, and the increased policing of the Old Faithful area. |
| RESPONSE: | Expenses related to winter use and maintenance are included in Appendix F. Costs for provided services would be borne by permittees or concessionaires. Since similar services are currently provided in both summer and winter, it is reasonable to assume they could be provided on a larger scale from West Yellowstone during the winter. |
| COMMENT: | In the section for the GTNP unit costs, there is a figure for a year round pathway listed at \$27,300,000. At a minimum, the cost of the pathway should be broken out from the cost of burying the utility line. Pathway costs in similar terrain in Teton County pathways have come in at under \$50 per linear foot, or \$250,000 per mile in round numbers. For a 22-mile pathway, this would be an estimated cost of \$5.5 million. I can't see how the \$27 million number was developed. |
| RESPONSE: | The pathway is estimated at 28 miles in length, twelve feet wide, with several major bridge crossings and steep grades to contend with. NPS is not certain how this compares with terrain for Teton County pathways. |
| COMMENT: | In the list of unit costs for YNP, Grooming snow road is \$27 per lane mile per day, yet the cost of grooming ski trail is \$468 per mile. Is the ski trail per day or per year? |
| RESPONSE: | The costs for road grooming will be reviewed and corrections made if appropriate. |
| COMMENT: | The expense of maintaining a campground at Colter Bay is unjustified. If some limited spaces for campers are to be provided, this should be at Flagg Ranch, since the highway will be kept open to there. |
| RESPONSE: | This is not a feature that NPS has justified in any way, other than it is the current condition. In some alternatives, this use would be discontinued because snowmobile use or snowplane use would not be allowed on Jackson Lake. As a note, costs are minimal because no services are provided for winter campers. |

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| COMMENT: | This alternative seems that it would be the most expensive because of all the roads being groomed and built in the addition to what already exists. In the creation of all these roads, the first National Park, Yellowstone loses its natural beauty. |
| RESPONSE: | Alternative B for GTNP proposes to relocate the Continental Divide Snowmobile Trail. This is the only new road construction proposed in the range of alternatives analyzed in the EIS. |
| <i>Snowcoach Access</i> | |
| SUMMARY COMMENT: | Allowing only snow coaches in would provide access chiefly for the wealthy. |
| SUMMARY RESPONSE: | The cost of renting a snowmobile versus purchasing a snowcoach fare is comparable. |
| SUMMARY COMMENT: | Access by snowcoach (only) will allow better control of use and better access for more citizens including the elderly and disabled. |
| SUMMARY RESPONSE: | NPS agrees and has incorporated a snowcoach only alternative in part for this reason. |
| SUMMARY COMMENT: | While snowcoaches may carry up to ten people there will, no doubt, be smaller groups whose transportation needs would not be compatible with enough others to fill up a coach. In these cases it may not be affordable or feasible to operate a snowcoach for a small group. |
| SUMMARY RESPONSE: | This argument could be made for currently operating snowcoach systems. It appears that the system and the customer base can adapt in order to meet the need for providing this service and allowing people to access the park's interior. |
| <i>Alternative B: Bus Access</i> | |
| COMMENT: | How will skiers and their equipment be handled? Will there be special buses for those who will stay in the park versus those just going in for a day trip? |
| RESPONSE: | Rack systems similar to those that may be found on snowcoaches or ski gondolas can be installed. Buses can be scheduled to meet the various needs of people going into or coming out of the parks. |
| SUMMARY COMMENT: | As it is now, every individual who enters the park on a snowmobile pays the entrance fee. Will everyone who enters in a tour bus pay this amount? If not, who is subsidizing their entrance, the taxpayer? |
| SUMMARY RESPONSE: | There are currently no plans to eliminate the entrance fee for any visitor group. |
| <i>Facilities and Services</i> | |
| COMMENT: | I question the need for establishing 6 additional miles of new over-snow motorized trails in Yellowstone. |

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| RESPONSE: | The desire for an additional oversnow motorized trail experience was raised as an issue during public scoping. The issue was addressed in an alternative and the effects of providing those additional experiences (both good and bad) are disclosed in the EIS. |
| SUMMARY COMMENT: | The DEIS&P should provide more details as to how these routes and trails are groomed, and the maintenance requirements of the roadway. |
| SUMMARY RESPONSE: | Details of implementation such as these are not necessary in analysis for a broad, programmatic plan. See Appendix F for cost itemized estimates. |
| SUMMARY COMMENT: | If we can't ride snowmobiles into the park, why would we need snowmobile trailer parking space? |
| SUMMARY RESPONSE: | Alternatives B and C do not preclude snowmobile use in the parks. |
| COMMENT: | Would facilities at Flagg Ranch, other than being a staging area, remain open? |
| RESPONSE: | In all alternatives, NPS indicates that Flagg Ranch would remain open. |
| SUMMARY COMMENT: | Parking at Old Faithful will be very limited and inadequate – how will the parking area be cleared when there isn't enough room to put the snow. |
| SUMMARY RESPONSE: | Capacities for parking at Old Faithful were calculated at 50% to allow for snow storage. |
| SUMMARY COMMENT: | How many vehicles will be allowed in the park? How would reservations be made - first come, first served, a lottery? Would a certain number be reserved for private individuals as opposed to tour operators? Would there be any sort of restrictions placed on the number of snowmobiles from the South or East Entrances? If not, doesn't that discriminate against those entering from the West Entrance? Would space be reserved for those who want to drive their own vehicle into Old Faithful? Would those staying at the Snow Lodge get preference for parking over those just making a day trip? |
| SUMMARY RESPONSE: | Scenarios of winter visitation may be found in the FEIS under visitor access, and in Appendix J. In alternative B, the general public would for the most part not access Old Faithful from West Yellowstone using personal vehicles. Some parking would be provided by reservation system. In alternative C, there would be less reliance on a mass transit shuttle system in favor of personal wheeled vehicle access. Parking would be limiting, but it is feasible to clear enough space to facilitate overnight stays at the lodge and some day parking. |
| SUMMARY COMMENT: | The effect of this action is that people will have to fill up at Old Faithful, and the fuel there will be severely impacted and will need to be increased to meet demand which has been artificially created by NPS action. |
| SUMMARY RESPONSE: | The present demand is artificially created in the same sense, because NPS allows access into the parks during the winter. Visitors have adapted to the existing situation and they can adapt to new ones. This is a routine function of management in the NPS/public relationship. |

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| COMMENT: | In the alternatives to plow the road and provide parking places at Old Faithful the document shows a calculation of numbers of snowmobiles that would use the area and that calculation says 5 snowmobiles per trailer. I have checked the market for trailers and have not found a 5-snowmobile trailer. Where did this number come from? |
| RESPONSE: | An average group size was mistakenly used. This statement has been altered in the FEIS. |
| SUMMARY COMMENT: | Bad weather (yes, it happens in winter) -- what happens to the people who get trapped at Old Faithful (OF)? Or 5-700 people arriving at one time at OF. OF doesn't have the facilities to handle this. |
| SUMMARY RESPONSE: | Bad weather occurs under current management. Emergency closures, while infrequent, also occur under current management. The same visitor management procedures would be implemented for emergency closures as are currently used. |
| COMMENT: | Page 12, -second table, Park Infrastructure and Operation, first row, Gasoline storage capacity: The comment refers to the limited amount of fuel storage in the interior of the Park. Alternatives B and G may not be valid alternatives because shuttles, snowplows, and snowcoaches would consume more fuel per mile than the current fleet of visitors. An effort would need to be made to ensure most of shuttles and/or snowcoaches enter the park with full fuel tanks. |
| RESPONSE: | Current mass transit systems operate under these circumstances. In order to implement various alternatives, some changes may need to be made – including additional planning and preparation by those who operate the systems. |
| COMMENT: | No mention is made of the need for a snowmachine staging area at Madison. How are persons in West Yellowstone to get their machines there? Also, if there is no staging area, then machines which arrive from Norris Junction will be forced to return by the same route. |
| RESPONSE: | The commenter is correct. The loss of visitor experiences under alternatives B and C are disclosed in the EIS. |
| COMMENT: | Staging areas, especially at Madison Jct. For snowcoaches, will have to be quite large. Truck and trailer for towing a snowcoach are 40 feet. A van to transport 10 snowcoach passengers and gear is 20 feet. When our 7 snowcoaches all go to Canyon, we will need 420 feet of parking plus a loading and unloading area. I am concerned about this necessary space to support just Alpen Guides at status quo...parking for waiting vans and buses. Piling plowed snow here will become more of a problem as winter progresses. |
| SUMMARY RESPONSE: | The NPS agrees that parking and staging at Madison Junction will be limited. This limitation will have a corresponding adverse effect on visitor experience by possibly limiting the number of visitors who can travel north via oversnow vehicle from the west. Oversnow travel by snowcoach would not be limited from north. The effect of this proposal on visitor experience has been disclosed in the EIS. |
| SUMMARY COMMENT: | You did not address the obvious issues such as the antiquated sewer systems, gas stations leaking fuel nor the limited storage for gas, day use facilities, sewage treatment, medical and police services, emergency, accident response, delivery services and garbage hauling. Reference page 296. |

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| SUMMARY RESPONSE: | All of these issues accrue to all the alternatives, including alternative A – no-action. They are not entirely winter use issues. Some issues are addressed by alternatives where the intent is to make visitation and access safer than under current management. Plowed road access between West Yellowstone and Old Faithful alleviates problem areas such as gasoline and solid waste storage at the destination site. This is indicated in the EIS. |
| SUMMARY COMMENT: | I am also concerned on the impact a snowmobile staging area at Old Faithful would cause. |
| SUMMARY RESPONSE: | The need for staging at Old Faithful would be no greater under any alternative than the existing condition. The intent in alternatives B and C is to provide wheeled vehicle access to the park’s interior from West Yellowstone, not to create a snowmobile staging area for access into the rest of the park. Unlimited snowmobile hauling from West Yellowstone would not be allowed. |
| SUMMARY COMMENT: | I truly anticipate snow machine rentals within YNP at the new Lodge at Old Faithful. Are we going to let this happen? |
| SUMMARY RESPONSE: | Limited rentals could be possible. Depending on how the decision is made: should alternative B or C be selected, interim caps on snowmobile use in the parks could be anticipated. |
| SUMMARY COMMENT: | I don't think you have the infrastructure, such as warming huts and rest areas, to increase nonmotorized use of the park significantly. You eliminate the pleasures of touring at one’s own pace. |
| SUMMARY RESPONSE: | Some alternatives provide for the construction of additional winter use facilities for these purposes. See the alternative descriptions. |
| SUMMARY COMMENT: | If YNP cannot improve the infrastructure as they claim, how can they, in good faith, propose to increase users (sic) days, which in turn creates more demand for better facilities? |
| SUMMARY RESPONSE: | There is no proposal specifically to increase user-days. There is also no indication that YNP cannot improve the infrastructure. The point is made in the EIS that infrastructure is not related strictly to winter use and that improved infrastructure must proceed through a different, but related, planning avenue. See Scope of Analysis in FEIS Chapter I. |